

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR,

Defendants.

DEFENDANT'S ASSENTED-TO MOTION FOR IMPOUNDMENT

Defendant Voice Signal Technologies, Inc. moves pursuant to Local Rule 7.2 and section 14 of the parties' agreed-to Protective Order for an order impounding Exhibits A and B to the Declaration of Wendy S. Plotkin in Support of Voice Signal's Opposition to ScanSoft's Motion to Compel the Depositions of Lawrence R. Gillick, Robert S. Roth, and Jonathan P. Yamron.

As grounds for this motion, Voice Signal states the Exhibits A and B are e-mails produced by ScanSoft in this litigation which ScanSoft has designated as highly confidential pursuant to the parties' Protective Order. Pursuant to section 14 of the parties' Protective Order, which was entered by the Court on March 11, 2005, any documents filed with the Court that disclose highly confidential information, as defined by the Protective Order, must be filed under seal.

While Voice Signal does not believe that the e-mails attached to the Declaration contain confidential information, ScanSoft has insisted that they be filed under seal.

WHEREFORE, Voice Signal requests that the Court enter an order impounding its Exhibits A and B to the Plotkin Declaration. Voice Signal further request that the Court grant it leave, pursuant to Local Rule 7.2(d), to file Exhibits A and B under seal concurrently with this motion for impoundment.

Respectfully submitted,

VOICE SIGNAL TECHNOLOGIES, INC.

By its attorneys,

/s/ Wendy S. Plotkin

Robert S. Frank, Jr. (BBO No. 177240)
Sarah Chapin Columbia (BBO No. 550155)
Paul D. Popeo (BBO No. 567727)
Paul E. Bonanno (BBO No. 646838)
Wendy S. Plotkin (BBO No. 647716)
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Dated: July 8, 2005

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that counsel for Voice Signal conferred with counsel for ScanSoft on July 8, 2005 in an effort to resolve the issues presented in this motion and that counsel for ScanSoft assented to this motion.

/s/ Wendy S. Plotkin